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District of Nevada  
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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SHARONE RANDOLPH,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-00555-JAD-PAL

**JOINT STIPULATION FOR EXTENSION OF  
TIME AND [PROPOSED ORDER]**

**(SECOND REQUEST)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from November 29, 2018 to **December 13, 2018**. This is Defendant's third request for extension. Good cause exists to grant Defendant's request for extension. Counsel has a family emergency on the date of the current filing deadline. Counsel also has over 75+ active matters, which requires two or more dispositive motions a week until mid-January. In addition, Counsel has active civil rights and representative misconduct matters that require immediate investigation. Counsel also has a Ninth Circuit brief due next week, which requires multiple levels of review. Due to Counsel's unexpected leave, Counsel became behind

1 on her heavy workload. As such, Counsel needs additional time to adequately review the transcript  
2 and properly respond to Plaintiff's Motion for Summary Judgment. Defendant makes this request in  
3 good faith with no intention to unduly delay the proceedings. The parties further stipulate that the  
4 Court's Scheduling Order shall be modified accordingly.

5  
6 Respectfully submitted,

7 Dated: November 29, 2018

/s/ \*Cyrus Safa  
(\*as authorized by email on November 29, 2018)  
CYRUS SAFA  
Attorney for Plaintiff

10  
11 Dated: November 29, 2018

DAYLE ELIESON  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

14  
15 By /s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

18 **ORDER**

19 APPROVED AND SO ORDERED:

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21  
22 DATED: December 4, 2018

  
HON. PEGGY A. LEEN  
UNITED STATES MAGISTRATE JUDGE

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**CM/ECF:**

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Respectfully submitted this 29th day of November 2018,

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